



San Diego County Water Authority

A Public Agency

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July 19, 1999

Ms. Susan Hoffman, Project Manager
U.S. Bureau of Reclamation
2800 Cottage Way
Sacramento, CA 95825

Dear Ms. Hoffman:

Thank you for the opportunity to comment on the draft Economic Evaluation of Water Management Alternatives (EEWMA) Report. The EEWMA represents an important step toward the development of a CALFED water management strategy and identification of a least-cost combination of water management options to meet California's long-range water supply needs. While we might take issue with some of the cost assumptions used in the Report, we recognize that the EEWMA is an initial screening tool designed to highlight the relative rather than the absolute costs of different resource mixes. We have therefore limited our comments largely to (1) assumptions that could change the relative costs of the various scenarios, and (2) formatting issues. Our comments are as follows:

- We have concerns regarding the accuracy of the cost and supply projections for urban conservation measures beyond the BMPs. Bulletin 160-98 includes options to reduce outdoor, indoor and commercial/industrial/institutional water use that have not been evaluated through the California Urban Water Conservation Council's (CUWCC) BMP review process. We are unsure how DWR arrived at the measures' estimated conservation savings and costs and believe the measures should not be included in the EEWMA as options until they are evaluated through the BMP review process to determine if the savings are achievable and cost estimates are accurate. The San Diego County Water Authority is committed to the implementation of BMPs as outlined in the Memorandum of Understanding of the CUWCC and participates in pilot programs, such as the horizontal axis washing machine pilot program, to identify additional cost-effective BMPs. Our concerns regarding the inclusion of options in addition to the BMPs do not reflect a belief that additional conservation will not be cost-effective (as suggested on page 7-9); rather, we are concerned that the EEWMA use accurate data. For the South Coast region, we believe that the water conservation data in the Urban Delta Exporters preference set is the most accurate data available at this time.
- The dry-year supply and demand estimates used Table 4-4 of the EEWMA are, according to Bulletin 160-98, reflective of a 1991-type drought scenario (a 1 in 20 year event). However, the SWP supply estimates in Table 4-4 do not appear to be

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consistent with a 1 in 20 year drought event. We are concerned that Table 4-4 may either (1) overstate the amount of SWP supplies available to the South Coast region in a drought year, or (2) overstate the amount of local surface and groundwater supplies available in a drought year. The result would be an overestimation of baseline supplies.

- In Table 6-5, how was the 0.8 MAF of membrane treatment capacity in the South Coast region calculated? Given the assumed source water quality requirements, wouldn't all SWP supplies require membrane treatment in the absence of an isolated facility?
- In Figures 8-1 through 8-5, it would be helpful to specify the total cost of new supplies under each preference set. The figures, as currently formatted, obscure the fact that the cost variation among the various preference sets can be quite large.
- In Table 8-1, it would be helpful to specify how much new dry-year supply is produced for each region under each scenario.
- The exclusion of the isolated facility from the Unconstrained scenario represents a significant constraint on this scenario. According to the draft PEIS/R, the isolated facility remains an option for achieving CALFED's long-term objectives. The Unconstrained scenario with the isolated facility, identified in the report as a sensitivity analysis, represents the true unconstrained scenario and should be labeled as such.

Thank you again for the opportunity to provide input on the draft EEWMA. We look forward to continuing to provide stakeholder input to this important study. If you have questions regarding our comments on the draft EEWMA, please call us at (619) 682-4100.

Sincerely,



Bill Jacoby
Water Resources Program Manager



Julia Maclay
Senior Water Resources Specialist

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